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14 *Proposed Class*

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 IN RE SEAGATE TECHNOLOGY LLC
19 LITIGATION

No. 3:16-cv-00523-JCS

20 STIPULATION AND [~~PROPOSED~~]
ORDER REGARDING
21 RESCHEDULING OF CLASS
CERTIFICATION HEARING AND
22 CASE MANAGEMENT CONFERENCE
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Pursuant to Local Rule 6-1(b), the parties submit this stipulated request to move the hearing date for oral argument on plaintiffs' motion for class certification and the case management conference to June 15, 2018, or any later date that is convenient with the Court. The oral argument is currently scheduled for this Friday, May 11, 2018.¹

WHEREAS since April 24, 2018, Seagate has produced 3,674 documents to plaintiffs, including:

- (a) 1,034 documents produced on April 24, 2018;
- (b) 2,409 documents produced on May 5, 2018; and
- (c) 211 documents on May 8, 2018.

WHEREAS Seagate has indicated that it contemplates one further production of less than 100 documents responsive to the outstanding document requests, and that it intends to produce these documents no later than May 11, 2018;

WHEREAS plaintiffs have requested additional time to review and assess these productions of documents, including whether a supplemental submission to the Court is necessary regarding the pending motion for class certification;

WHEREAS Seagate does not object to moving the hearing on class certification for up to 30 days, but reserves its rights to oppose any supplemental submission;

IT IS STIPULATED BETWEEN THE PARTIES that the class certification hearing and case management conference scheduled for this Friday, May 11, 2018 is agreed to be moved to June 15, 2018, at 9:30 a.m. or any later date that is convenient with the Court.

DATED: May 8, 2018

HAGENS BERMAN SOBOL SHAPIRO LLP

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¹ Local Rule 6-1(b) usually requires that any stipulated request or motion which affects a hearing on the Court's calendar be filed no later than 14 days before the scheduled event. In this case, the facts that affect the hearing date arose days before oral argument. As a result, the parties were unable to give the Court the two weeks' notice.

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DATED: May 8, 2018

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E-FILING ATTESTATION

I, Shana E. Scarlett, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

s/ Shana E. Scarlett
SHANA E. SCARLETT

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As stipulated, the class certification hearing and case management conference scheduled for May 11, 2018 is moved to June 15, 2018, at 9:30 a.m.

IT IS SO ORDERED.

DATED: May 9, 2018

